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October 2, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
12<sup>th</sup> Street Lobby, TW-A325  
Washington, D.C. 20554

**Re: In Re Provision of Directory Listing Information Under the  
Telecommunications Act of 1934, As Amended,  
CC Docket No. 99-273**

Dear Ms. Salas:

Pursuant to Section 1.1206(b) of the Commission's Rules, this letter is to inform the Commission that Brett Haan, Vice President of Telegate, Inc. and I met with Jordan Goldstein, legal advisor to Commissioner Ness on September 29, 2000.

The meeting was held to discuss issues related to Telegate's proposal for pre-subscription of 411. In particular, we emphasized the important consumer benefits to be expected from 411 pre-subscription, especially when balanced against the modest cost of implementing Telegate's proposal. We discussed the issues summarized in the attached Powerpoint presentation and also provided Mr. Goldstein a copy of Telegate's written ex parte submission of March 10, 2000, which is a part of this docket.

Should there be any questions concerning this matter, please contact the undersigned.

Very truly yours,



Kelly Cameron  
For Powell, Goldstein, Frazer & Murphy LLP

Cc: Jordan Goldstein

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# **Presubscription to 411**

**Presentation by Telegate Inc.**

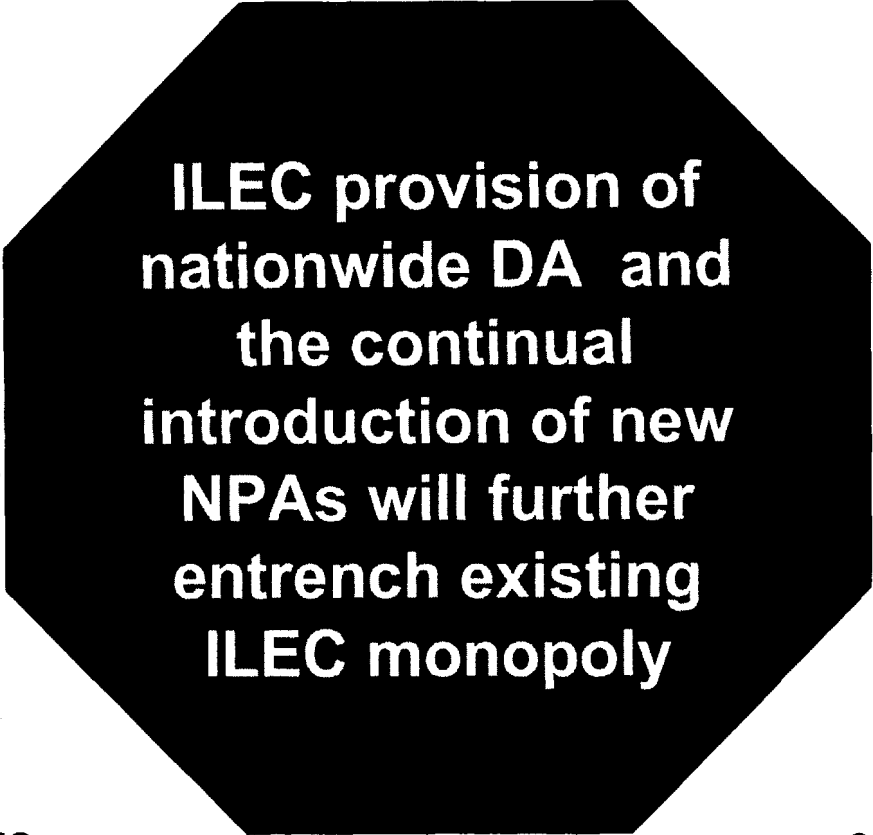
**September 28, 2000**

# 411 Directory Assistance

- Universally recognized dialing code for directory assistance
- \$4 billion industry and growing rapidly
- Monopoly control by ILECs

# ILEC Monopoly Control over 411 DA Has Lead to Predictable Harms

- Inaccurate Information
  - Accuracy rates of 80% at best
- Poor Service Quality
- Reduced Innovation
- Unserved Communities  
(e.g. Spanish speakers)



**ILEC provision of nationwide DA and the continual introduction of new NPAs will further entrench existing ILEC monopoly**

# Competition for 411 DA Has Obvious Benefits for Consumers

- Incentives to provide accurate information
- Improved service quality
- More innovation
- Service to underserved communities

# Telegate's Track Record on DA

- ✓ **98% accuracy**
- ✓ **Serving Underserved markets**
  - Turkish speakers in Germany
  - Plan to target Spanish speakers in U.S.
- ✓ **Job creation:**
  - Germany:
    - 2,000 new jobs
    - Majority high unemployment areas
  - U.S. – plan to build call centers in rural and inner city areas
- ✓ **Bridging Digital divide:** Creating jobs with a future through training to provide enhanced 411 and other information services.



Recognized in Germany as  
1999 Employer of the Year

# FCC Should Allow Consumers to Presubscribe to 411 DA Service

- FCC has recognized value of 411 to consumers
- Despite visible, expensive marketing campaigns for dial-around DA services, even AT&T and MCI-Worldcom could not compete with ILEC 411 DA
- Presubscription proven successful by long distance competition

# Telegate's 411 Presubscription Proposal is a Practical Solution that can be Implemented Cheaply and Easily

- **Technical:** routes calls to subscriber's preferred DA provider using software that is already deployed in vast majority of central office switches.
  - Advanced Intelligent Network software (AIN)
  - Signalling System 7 (SS7)
- **Practical:** proposes balloting and allocation procedure as fairest, most pro-competitive method
- **Costs:**
  - Technical fix approx. \$21M
  - Just over \$1/line (one-time charge)



# FCC Has Complete Record and Can Establish 411 Presubscription Now

- September 9, 1999: FCC releases Directory Listing Information NPRM
- October 13, 1999 Telegate files Comments proposing allowing customers to choose their 411 DA provider.
- March 10, 2000 Telegate files detailed *ex parte* outlining proposal
- April 27, 2000: FCC releases Public Notice seeking comment on Telegate's proposal
- May 30, 2000: 15 parties file Comments
- June 14, 2000: 8 parties file Reply Comments